

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

UNITED STATES OF AMERICA	:	CASE NUMBER: 1:20-CR-60
	:	
PLAINTIFF	:	JUDGE BARRETT
	:	
Vs.	:	
	:	
DAVID KEMP	:	
	:	
DEFENDANT	:	

**DEFENDANT'S RESPONSE TO GOVERNMENT'S RESPONSE IN OPPOSITION**

Counsel for the Defendant, David Kemp, has reviewed the Government's response. Specifically, the declarations by Jim Geisen and Anthony Brazier are a complete lie. I was never even allowed into the building. They have purposely lied to this court. The video from the day in question will show that I was never even allowed in the facility. I request this Court order the camera videos from the day in question. Moreover, I ask that myself, Anthony Brazier, Jim Geisen and George Earls be placed under oath and testify as to what happened on the day in question. As previously stated, I spoke with George Earls about being refused entry. He called back and said I could go in. Again, I was denied entry and called Mr. Earls back and informed him. My phone records will show that U.S. Marshalls were called twice that day by me and within minutes. Before you can enter the Boone County Jail, you speak into an intercom and identify yourself as an attorney. You do not give your name or the inmate's name. Once you are let in the front door, you proceed to a window where you give your credentials and identify the inmate you want to see. On the day in question, I was denied access to the building and never did I give my name or my client's name.

The false representations by Anthony Brazier and Jim Geisen shows that they will lie and do anything to retaliate against counsel and his client. Other attorneys are also experiencing problems with the Boone County Jail. Attached is a memo from the Commonwealth Department of Public Advocacy. This Court ordering the videos from the day in question and placing myself, Jim Geisen, Anthony Brazier and George Earls under oath is needed.

Respectfully Submitted,

S/William M. Welsh  
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing has been served electronically upon, Assistant United States Attorney, via electronic, on the same date this Motion was filed.

/s/ WILLIAM M WELSH  
William M. Welsh (0059973)